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### GRANTED.


The Court grants the 60-day extension to the motion schedule. Defendants motions due by February 1, 2021. Government responses due by February 15, 2021. The Motion Hearing previously set for January 8, 2021 is rescheduled to March 8, 2021. The Court, with consent of all parties, excludes time until March 8, 2021 pursuant to the Speedy Trial Act, 18 U.S.C. 3161(h)(7)(A), upon a finding that the interest of justice outweighs the interest of the public and the defendant in a speedy trial, in that the time between now and March 8 will allow for parties to continue discussions with each other and consider and prepare any pretrial motions. Counsel for defendant, Jeffry Guzman De La Cruz, is to inform the Court by 12/2/2020 whether he too requests the extension and consents to the corresponding exclusion of time.

November 30, 2020

Via ECF

11/30/2020

SO ORDERED.

  
LEWIS J. LIMAN  
United States District Judge

The Honorable Lewis J. Liman,  
United States District Court Judge,  
Southern District of New York,  
500 Pearl Street, Courtroom 15C,  
New York, NY 10007-1312.

Re: United States v. Sarante, et al., No. 20-cr-00157 (S.D.N.Y.)

Dear Judge Liman:

I represent the defendant Miguel Sarante in the above-captioned case and write with the consent of the parties to request a 60-day adjournment of the motion schedule, which currently requires the defendants to submit any motions by December 1, 2020, and the government to respond by December 15, 2020. The Court has scheduled a motion hearing for January 8, 2021. In making this request, I have conferred with counsel for the defendant Jeffry Guzman De La Cruz and counsel for the Government, who are copied on this letter.

The defendants are engaged in respective discussions with the Government that may make motions unnecessary. While the parties have made meaningful progress in their discussions since the last pre-trial conference,<sup>1</sup> due to the ongoing pandemic—including limitations on each defendant's ability to communicate with his respective counsel—the parties are unable to complete those discussions at this time. I respectfully request a 60-day extension of these deadlines while the parties continue to engage in, and hopefully complete, those discussions. This is the second request for an adjournment or extension.<sup>2</sup>

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<sup>1</sup> The court held a pre-trial conference for Mr. Sarante on September 30, 2020, and for Jeffry Guzman De La Cruz on October 2, 2020.

<sup>2</sup> See May 15, 2020 Letter Motion from N. Friedlander (Dkt. No. 18).

The Honorable Lewis J. Liman,

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The parties also agree to an exclusion of time under the Speedy Trial Act during the pendency of these discussions.

Respectfully Submitted,  
/s/ Nicole W. Friedlander  
Nicole W. Friedlander

cc: AUSA Jason Swergold (via ECF)  
Sabrina Shroff Esq. (via ECF)